

(Stipulating Parties Listed on Signature Pages)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-01656;

Stoebner, et al. v. LG Electronics, et al., No. 11-cv-05381;

Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp, et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;

Office Depot, Inc. v. Hitachi Ltd., et al., No. 11-cv-06276;

CompuCom Systems, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06396;

Costco Wholesale Corporation v. Hitachi, Ltd., et al., No. 11-cv-06397;

P.C. Richard & Son Long Island Corporation, et al., v. Hitachi, Ltd., et al., No. 12-cv-02648;

Schultze Agency Services, LLC, et al. v. Hitachi, Ltd., et al., No. 12-cv-02649.

**STIPULATION AND [PROPOSED]
ORDER ENLARGING DIRECT
ACTION PLAINTIFFS' TIME TO
FILE OPENING BRIEFS REGARDING
PORTIONS OF SPECIAL MASTER'S
MAY 2, 2013 REPORT AND
RECOMMENDATIONS ON MOTIONS
TO DISMISS DIRECT ACTION
COMPLAINTS SPECIFIC TO
SAMSUNG ELECTRONICS
COMPANY, LTD. AND SAMSUNG
ELECTRONICS AMERICA, INC.**

1 WHEREAS, there is pending in the United States District Court for the Northern District
 2 of California a multidistrict consolidated proceeding comprised of actions brought on behalf of
 3 purported purchasers of cathode ray tube (“CRT”) products, captioned as *In re: Cathode Ray*
 4 *Tube (CRT) Antitrust Litigation*, Case No 3:07-cv-05944 SC (MDL No 1917) (the “MDL
 5 Proceedings”); and

6 WHEREAS, Direct Action Plaintiffs (“DAPs”) filed complaints¹ (“Complaints”), that list
 7 Samsung Electronics Company, Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEAI”)
 8 among the defendants; and

9 WHEREAS, the Complaints assert certain claims under federal and various states’ laws
 10 against SEC and SEAI based on an alleged conspiracy to fix the prices of CRTs from March 1,
 11 1995 to November 25, 2007 (“DAPs’ CRT Claims”);

12 WHEREAS, Special Master Charles A. Legge recommended that the Complaints against
 13 SEC and SEAI be dismissed with leave to amend on May 2, 2013 (“Report and
 14 Recommendations”) [Dkt. No. 1664]; and

15 WHEREAS, on May 9, 2013, this Court entered an order granting the parties’ Stipulation
 16 Regarding Special Master’s May 2, 2013 Report and Recommendations on Motions to Dismiss
 17 Direct Action Complaints [Dkt. No. 1666], requiring that opening briefs in support of objections
 18 to portions of the Report and Recommendations be filed on or before May 31, 2013;

19 WHEREAS, SEC and SEAI have agreed to grant DAPs an additional 7 days to file
 20 opening briefs in support of their objections, if any, to portions of the Report and
 21 Recommendations specific to SEC and SEAI;

22 ¹ Specifically, this Stipulation relates to the following complaints: *Stoebner v. LG Electronics,*
 23 *Inc.*, No. 11-cv-05381 (N.D. Cal.) [Dkt. No. 1] (Nov. 7, 2011); *Target Corp. v. Chunghwa*
 24 *Picture Tubes, Ltd.*, No. 11-cv-05514 (N.D. Cal.) [Dkt. No. 9] (Jan. 6, 2012); *P.C. Richard & Son*
 25 *Long Island Corp. v. Hitachi, Ltd.*, No. 12-cv-02648 (N.D. Cal.) [Dkt. No. 1] (Nov. 14, 2011);
 26 *Schultze Agency Servs., LLC v. Hitachi, Ltd.*, No. 12-cv-02649 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,
 27 2011); *CompuCom Systems, Inc. v. Hitachi, Ltd.*, No. 11-cv-06396 (N.D. Cal.) [Dkt. No. 1] (Nov.
 28 14, 2011); *Interbond Corp. of Am. v. Hitachi, Ltd.*, No. 11-cv-06275 (N.D. Cal.) [Dkt. No. 1]
 (Nov. 14, 2011); *Costco Wholesale Corp. v. Hitachi, Ltd.*, No. 11-cv-06397 (N.D. Cal.) [Dkt. No.
 1] (Nov. 14, 2011); *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,
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 2011); *Best Buy Co., Inc. v. Hitachi, Ltd.*, No. 11-cv-05513 (N.D. Cal.) [Dkt. No. 1] (Nov. 14,
 2011); and *Electrograph Systems, Inc. v. Hitachi, Ltd.*, No. 11-cv-01656 (N.D. Cal.) [Dkt. No. 5]
 (Mar. 10, 2011).

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
 2 undersigned counsel, on behalf of their respective clients, that subject to the Court's approval, the
 3 time for DAPs to file their opening briefs in support of their objections, if any, to portions of the
 4 Report and Recommendation specific to SEC and SEAI is extended to and including June 7,
 5 2013. This stipulation is entered into without waiver of any parties' respective rights, claims, or
 6 defenses.

7 **IT IS SO STIPULATED.**

8
 9 Dated: May 30, 2013

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 19 Dated: May 30, 2013

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17 *Son Long Island Corporation, Marta*
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**Pursuant to Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this
document has been obtained from the signatories.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Samuel Conti
United States District Judge